LEAD TESTING IN CHILD CARE FACILITIES AND SCHOOLS PROGRAM DRINKING WATER GRANT

Federal Fiscal Year 2021 WORK PLAN FOR THE STATE OF OHIO March 2022

Summary Statement

The Ohio Department of Health (ODH) has administered a comprehensive statewide lead poisoning prevention program since 1991. ODH's lead program provides guidelines on lead testing and medical management, educates healthcare providers, conducts surveillance and case management, conducts public health lead investigations (either directly or through local delegated boards of health), licenses the professional workforce, approves lead laboratories, and provides compliance assistance and monitoring. ODH receives funding for lead poisoning prevention from the U.S. Centers for Disease Control and Prevention, U.S. Department of Housing and Urban Development, U.S. Environmental Protection Agency, Ohio Development Services Agency, Ohio Housing Finance Agency, and General Revenue Funds.

When a child under six years of age is identified with an elevated blood lead level (lead poisoning), ODH or its delegated authority conducts a public health lead investigation to determine the probable source of lead exposure. If an investigation identifies an existing lead hazard, a Lead Hazard Control Order is issued ordering the property owner to control the lead hazard. If a property owner refuses to control an identified lead hazard, an order to vacate the property is issued, declaring it unsafe for human occupation, especially for children younger than 6 years of age and pregnant women. As of 2018, 168,352 children in Ohio under the age of six have had their blood test for lead, and 3,856 of those children were found to have elevated blood lead levels (EBLs).

With funding appropriated under section 1464(d) of the Safe Drinking Water Act, amended by the Water Infrastructure Improvement Act (WIIN) section 2107, the Ohio Department of Health (ODH) in collaboration with the Ohio EPA and ODJFS, plans to expand efforts to reduce lead in water exposures to children through the assessment of child care facilities and will expand to include school buildings in which child care facilities reside.

There are three different types of child care programs in Ohio that will be included in this project: Type A Home, which child care is provided in the owner's home for 7 to 12 children, Type B Home, which child care is provided in the owner's home for 1 to 6 children, and center, which care is provided outside of a residence for 7 or more children.

The program will also target, and recruit school buildings where child care facilities are operated. The expanded program will now be known as Ohio's Lead Testing in Child Cares and Schools Program. The state will continue to prioritize facilities, and now schools, serving younger children located in undeserved and low-income communities, facilities/schools that are older and more likely to contain lead plumbing and fixtures, communities with children that have elevated blood lead levels (EBLs), and areas with zip codes that have been determined to be high risk by the ODH.

ODH will continue to follow the US EPA's 3Ts guidance as a model to: (1) Communicate, throughout the implementation of the program, the results and important lead information to the public, parents, teachers, and larger community; (2) Train on the risks of lead in drinking water and testing for lead, as well as developing key partnerships to support the program; (3) Test using appropriate testing protocols and a certified laboratory; and (4) Take Action, addressing elevated lead levels by referring child care facilities/school buildings to the Ohio Plumbing Fixture Replacement program where [HYPERLINK "http://www.nf.gov/CATHI" \h]

SCOPE OF WORK

This section discusses Ohio's plan to develop and implement the lead testing program in child care facilities/schools, and how this program meets goals as they relate to the reduction of lead in drinking water exposure to children.

The scope of work contained in this project description includes the following categories and information.

- I. STATE GOALS AND PRIORITIES
- II. PROGRAM IMPLEMENTATION AND ACTIVITIES
- III. ROLES AND RESPONSIBILITIES
- IV. TIMELINE AND MILESTONES
- V. WIIN PROGRAMMATIC PRIORITIES AND EPA'S STRATEGIC PLAN LINKAGE
- VI. ANTICIPATED OUTCOMES/OUTPUTS
- VII. BUDGET NARRATIVE

I. STATE/TERRITORY GOALS AND PRIORITIES:

ODH has identified goals and priorities consistent with the priorities outlined in EPA's State Lead Testing in School and Child Care Program Drinking Water Grant Implementation Document (found here: www.epa.gov/safewater/grants). In accordance with the America's Water[HYPERLINK "http://www.epa.gov/safewater/grants" \h]018, which amended the SDWA section 1464(d), ODH will assist in voluntary testing for lead contamination in drinking water at child care facilities and schools that are in low-income areas. This is described based upon the affordability criteria established by the State under SDWA section 1452(d)(3). More specifically, Ohio has established the following order of prioritization in the selection of childcare facilities for testing:

- Child care facilities/schools in areas that have elevated blood levels (EBLs),
- 2. Areas with zip codes that have been determined to be high risk by ODH
- 3. Child care facilities/schools that are known to have public and/or private lead service lines
- 4. Low income areas This may include child care facilities/centers or school buildings that have an agreement with the state to accept Medicaid funded children or based on census tract data for median household income and average housing cost;

- 5. Child care facilities that primarily care for children 6 years and under, with emphasis on Type A and Type B home facilities as they are more likely to have lead service lines and fixtures;
- 6. School buildings housing child care facility operations;
- 7. Other school buildings located in low income districts;
- 8. Older facilities/schools that are more likely to contain lead plumbing
 - a) Facilities built before the United States ban of lead in 1986
 - b) Facilities built after 1986 with evidence or knowledge of lead service lines (public and/or private)
- 9. Established and sustainable child care programs without factors indicating that the building may not be serving as a child care facility in the future;

Ohio may need to exercise some flexibility in considering the order of prioritization when selecting testing sites based on the community demographics and geographic area.

Ohio has considered the prioritization of sampling sites and key locations in the state. The program will target at least two Ohio counties considering the following:

- Dense county population
- The number child care facilities and schools located within the county
- Prevalence of children with elevated blood lead levels in the county
- Existence of progressive lead line maps
- Public water utility companies located within the county that a lead drinking water testing programs for child care facilities, schools and homes and have conducted public education efforts

Ohio proposes to continue its ambitious marketing in new counties enrolled into the project to encourage child care facility and school participation. Other service areas in Cuyahoga and Hamilton County, Athens, Clark, Franklin, Lucas, Mahoning, Montgomery, Muskingum, Stark, Summit, Washington. Expansion to these counties will be based on consideration of the above listed priority criteria. These counties represent urban areas with high population densities for their respective regions and are above the state of Ohio's median number of confirmed cases of children with EBLs. Ohio will offer testing to facilities in these locations until all grant funds are expended.

It is ODH's goal to reduce lead exposure at these facilities/schools by testing for lead, identifying potential lead sources and taking action. Using the priorities listed above, this testing effort includes the goals of:

- a) Testing all primary fixtures used for water consumption and hand-washing in at least two other counties in the state (Expansion project) with an estimated 3,300 samples collected from child care facilities and schools registered to participate in the program. Sampling includes post-remediation sampling.
- b) Providing education about lead and the importance of testing to all child care facilities/schools in at least two other counties targeted for sampling.

II. PROGRAM IMPLEMENTATION AND ACTIVITIES:

For the state of Ohio, ODH will be the lead agency for administration of this grant and the implementation of Ohio's Lead Testing in Child Cares and Schools Program. ODH will coordinate all aspects of the grant related to evaluation of blood lead data and health effects related lead exposure. Ohio EPA will assist with coordination of all activities related to the public water utilities.

ODJFS will assist with communication to licensed child care facilities/schools and respond to regulatory matters. The local water utilities in participating counties will assist with facility outreach, local training, and site sample collection actions, conduct the analysis of the water samples, and provide sample results.

A marketing contractor will be secured to develop the media campaign to be in two or more Ohio counties. The overarching media campaign will be targeted at the general public within the counties to inform individuals about the danger of lead in drinking water. This marketing will be conducted over various mediums including radio ads, social media and other marketing outlets. The marketing contractor is an experienced contractor with effective experience in working in disadvantaged communities.

ODH will also contract with a firm who will develop the content for the statewide and local marketing campaigns. ODH hopes that the firm will be able to develop content that will educate the general public and child care facility operators of the dangers of lead in drinking water.

ODH will secure a third-party contractor through a competitive bidding process or continue to use a vendor who may have been contracted with other WIIN grant funds. The main hurdle will be identifying willing child care facilities/schools to participate in the program. Previous outreach efforts to the child care facilities/schools regarding testing have resulted in a low response. ODH will exert efforts in increasing participation rates in the selected counties.

When the program is expanded to other counties, the third-party contractor will conduct all outreach, sampling, and post sampling actions if the local utility does not have the ability to do so.

Below are specific activities included in this grant program:

Communication: ODH will continue to foster existing partnership with key state agencies and will seek out new partnerships in the counties selected. Based on the experience gained to date, Ohio recognizes the need to develop a creative marketing campaign for the program to attract participants, to ensure the timely dissemination of test results, and provide options for remediation if lead is detected. Therefore, information about the sampling program and lead in drinking water will be shared before the lead in drinking water sampling program begins, after obtaining the results of testing, when/if corrective measures are decided upon (and in the event no corrective measures are appropriate because the lead levels are low), to provide information and assistance on available remediation options, and in response to periodic interest in the program.

Agency	Communication actions to increase awareness and
ODH	 Serve as point of coordination for program communication activities for the state and local participating agencies including development, review and dissemination of media and program materials. Create website (with input for all agencies) detailing the program and providing links to additional resources. Create and post on social media information to increase awareness and participation in the program. Provide information and training to local health districts on the program and provide informational materials for health districts to provide to facilities during routine food safety and/or other health inspections.
	Establish monthly coordination meetings
Ohio EPA ODJFS/Local JFS Offices	 Assist with coordination of activities with the new participating water utilities. Post on social media to increase awareness and participation in the program Notify current and prospective child care facility operators/school administrators about the availability of the program. Post on social media to increase awareness and participation in the program Discuss program and distribute informational materials about the program during routine child care inspections Provide list of child care facilities/schools for mailer
Water Utility	 distribution Post on social media to increase awareness and participation in the program
Third Party Contractor	Collaborate with Marketing contractor to conduct demographic analysis and develop a proposed marketing campaign.
Marketing Contractor	 Conduct demographic analysis and develop a proposed marketing campaign in collaboration with grant partners that will incorporate the use of social media, radio ads, and other marketing methods, as appropriate. Develop informational materials and mailers for distribution. Develop social media posts targeting child care facilities/schools

Agency	Communication actions after a child care facility has chosen
ODH	 to participate Provide information and assistance to participating
ODIT	facilities on how to obtain funding from the state's
	Plumbing Fixture Replacement Program for Child Cares
	and Schools for fixture or indoor plumbing remediation if necessary
	 Maintain hotline 1-877-LEADSAFE and direct agencies
	to respond as necessary
	Provide information on available remediation resources
	for facilities
Ohio EPA	Provide information on how to obtain funding from
	H2Ohio water quality initiative state funding for lead
	service line replacement if a lead service line is present
ODJFS/Local	 Respond to licensing rule questions
FS Offices	 Enforce remediation as necessary of known lead
	hazards at child care facilities discovered during testing.
Third Party	Contact child care facility/school to go over the
Contractor	sampling process to be performed by the contractor
	 Contact child care operator/school administrator to
	remind them of the sampling appointment.
	 Maintain and post data on the program website
	maintained by the Third-Party Contractor with all data
	accessible to the state agencies, and facilities/schools
	only able to access their own data
	 Contact child care facility/school to discuss results and
	direct them to the proper agency for remediation, if
	necessary
Marketing	 Develop a comprehensive statewide marketing strategy
Contractor	to make the child care facilities/schools in other target
	counties aware of the dangers of lead in drinking water;
	also target the general public statewide
Marketing	 Develop content for marketing campaign to be used by
Content	marketing contractor for education and outreach
Development	purposes.
Contractor	

Training:

Agency	Training actions

ODH	Collaborate with the Third-Party Contractor and Water Utilities to train the child care facilities/schools on the health effects of lead in drinking water and provide guidance/information on filters and
Ohio EPA	fixture replacement Collaborate with the Third-Party Contractor and Water Utilities to Train child care facilities/schools on how lead in drinking water is regulated and guidance on remediation for lead service line replacement
Third Party Contractor and/or Water Utility	 Train the child care facilities/schools of the dangers of lead exposure to children Train the child care facilities/schools on what the potential sources of lead in drinking water are Train the child care facilities/schools on resources for remediation, if necessary

Testing: Water samples collected at child care facilities will be analyzed at an [HYPERLINK "https://www.epa.gov/sites/production/files/2018-09/documents/module_5_3ts_2-step_sampling_protocol_508.pdf" \h] to test lead in drinking water, with the processing and analysis of samples collected under this program utilizing EPA's 3Ts guidance 2-step sampling protocol, as described at

[HYPERLINK "https://www.epa.gov/sites/production/files/2018-09/documents/module5_3ts_2-"]ste[HYPERLINK "https://www.epa.gov/sites/production/files/2018-09/documents/module 5 3ts 2-step sampling protocol 508.pdf" \h].

Sample collection will include taking the initial 250 mL first draw sample at each tap and one 30 second flush sample at all fixtures and/or taps used at the facility for drinking water, cooking and handwashing. Outlets not being tested will be labeled as "not for drinking water." This may include utility sinks and certain bathroom sinks. ODH will use the sampling plan developed with previous grant funding. Based on data from ODJFS, approximately 60% of facilities in the target counties are Type A and B facilities and 40% are child care centers. It is estimated that Type A and B facilities will have 3-4 fixtures used in the home for child care to be tested, and child care centers will have 5-6 fixtures to be tested. School buildings have even more. Based on previous testing the average number of fixtures to be tested in school is 10-15. If necessary, additional fixtures will be added for testing based upon the facility walkthrough and sampling plan. Overall, ODH anticipates:

- 3,300 samples to be collected in child care facilities and/or school buildings located in two expansion counties;
- 10% (330) of the taps to require remediation, and post-remediation confirmation sampling.

Agency	Testing actions
Third Party	Prepare Quality Assurance Project Plan (QAPP) in accordance with
Contractor	US EPA guidance
and/or	Conduct sample collection at the child care facility/school
Water	 Submit samples to an Ohio approved drinking water laboratory for
Utility	analysis

Taking Action: The state agencies have worked to identify existing sources of funding to assist with remediation of fixtures and lead service lines. Ohio intends to continue to seek funding sources to assist with remediation at these facilities. Responses to results will follow remediation recommendations in the 3Ts guidance. Collaborating agencies on Ohio's Lead Testing in Child Cares Program have developed a specific plan to respond to results of testing if lead is detected, noted in the table below. Detection of lead may initiate regulatory requirements by ODJFS, provision of information and assistance on available state or local remediation funding depending on the source of the lead contamination in the drinking water (e.g. fixture, private service line, indoor plumbing).

Agency	If lead is detected
ODH	 If the source of lead is determined to be present in indoor plumbing or a fixture, the operator/school administator will work with ODH to enroll the facility into the fixture replacement program. Recommend blood lead testing to all children if they have not had a recent blood lead test.
Ohio EPA	 Assist with coordination of H2Ohio funding for public and private lead service line replacement for Type A and B and child care centers.
Third Party Contractor and/or Water Utility	 Direct child care facilities to <i>ODH</i> to access <i>fixture replacement funds</i>. Follow up and tracking of remediation efforts at facilities/schools. Conduct post-remediation sampling to ensure remediation efforts were effective.

III. ROLES AND RESPONSIBILITIES:

A list of roles and responsibilities are listed below, and potential project partners are identified in Appendix A.

3Ts Program Contact : This person will act as the point of contact for your 3Ts Program and help coordinate the communication efforts.	
Public Communications Team: Communicate testing plans, results, and remediation efforts to the public. The public consists of, but is not limited to, the child care community, media outlets, civic groups, etc.	All State Agency Partners with support from a third- party contractor and local water utility

Public Hotline: This person will monitor the hotline (1-877-LEADSAFE) to ensure questions and concerns are being responded to.	Staff, ODH
Website and Social Media Contact: This person will make sure website[HYPERLINK "http://www.nf.gov/CATHI" \h][HYPERLINK "http://www.nf.gov/CATHI" \h][HYPERLINK "file:///\\\\s.odh.isi.oitfs.ohio.gov\\ODHHome\\10181147\\WIIN%20Grant\\(")][HYPERLINK "http://www.nf.gov/CATHI" \h][HYPERLINK "http://www.nf.gov/CATHI" \h][HYPERLINK "http://www.nf.gov/CATHI" \h]information.	All State Agency Partners and Marketing Contractor with support from a third- party contractor
Partner Liaison Contact: This person will work with certified laboratories, interest groups, and other partners supporting and interested in the school's 3Ts Program to schedule activities and maintain communication.	Staff, ODH and Ohio EPA with support from a third- party contractor and local water utility
Sampling Plan and Execution Contact: This person will lead the effort to develop a sampling plan for the daycare. They will also engage with other program points of contact and external resources and partners as appropriate.	Third-Party Contractor, TBD with support from local water utility
Remediation Activities Contact: This person will lead the remediation efforts, if necessary, and engage with other program points of contact and external partners as appropriate, acting as the Program point of contact for those resources.	Staff, ODH and Ohio EPA with support from a third- party contractor and local water utility
Recordkeeping Contact: Ensure a central repository is created to house all 3Ts Program documents. Lead effort to create, maintain and update documentation with the team annually.	Staff, ODH with support from a third- party contractor and local water utility
Sample Testing Contact: This person will coordinate with a certified lab to ensure the samples are analyzed properly and quickly	Staff, ODH with support from a third- party contractor and local water utility

IV. TIMELINE AND MILESTONES:

A detailed timeline for the project, including milestones for specific tasks, can be found below.

Fiscal	Project Specific Tasks and Milestones
Quarter	

FFY2022 Quarter 1 (4/1/22- 6/30/22)	Identify expansion target counties for testing, sample collection, and analysis. By the end of the quarter, identify two counties that will be included in the project expansion.
FFY2022 Quarter 2 (7/1/22- 9/30/22)	Initiate testing activities (training, sample collection and analysis). By the end of the quarter, collect and analyze 450 (10% completed) samples from participating child care facilities/schools in the expansion project. Submit annual report to USEPA.
FFY2023 Quarter 3 (10/1/22- 12/31/22)	Ongoing testing activities (training, sample collection and analysis). By the end of the quarter, collect and analyze 450 (30% completed) samples from participating child care facilities/schools in the expansion project. Collect and analyze 60 (20% completed) post remediation samples in child care facilities/schools that have participated in remediation.
FFY2023 Quarter 4 (1/1/23- 3/31/23)	Ongoing testing activities (training, sample collection and analysis). By the end of the quarter, collect and analyze 450 (45% completed) samples from participating child care facilities/schools in the expansion project. Collect and analyze 60 (40% completed) post remediation samples in child care facilities/schools that have participated in remediation.
FFY2023 Quarter 5 (4/1/23- 6/30/23)	Ongoing testing activities (training, sample collection and analysis). By the end of the quarter, collect and analyze 450 (60% completed) samples from participating child care facilities/schools in the expansion project. Collect and analyze 60 (60% completed) post remediation samples in child care facilities/schools that have participated in remediation.
FFY2023 Quarter 6 (7/1/23- 9/30/23)	Ongoing testing activities (training, sample collection and analysis). By the end of the quarter, collect and analyze 450 (75% completed) samples from participating child care facilities/schools in the expansion project. Collect and analyze 60 (40% completed) post remediation samples in child care facilities/schools that have participated in remediation. Submit annual report to USEPA.
FFY2023 Quarter 7 (10/1/23- 12/31/23)	Ongoing testing activities (training, sample collection and analysis). By the end of the quarter, collect and analyze 450 (90% completed) samples from participating child care facilities/schools in the expansion project. Collect and analyze 60 (40% completed) post remediation samples in child care facilities/schools that have participated in remediation.
Final Quarter FFY2023 Quarter 8 (1/1/24- 3/31/24)	Project wrap up — remaining sample collection and analyze 300 samples (100%), report results. Analyze project sample results and participation, survey findings, and prepare final report to US EPA. Submit final progress report to US EPA.

V. WIIN PROGRAMMATIC PRIORITIES AND EPA'S STRATEGIC PLAN:

The principal objective of the assistance to be awarded under this program is to provide grants to states to help local education agencies test schools and child care facilities for lead contamination in drinking water, utilizing EPA's 3Ts guidance or applicable state regulations or guidance that are not less stringent. The

objective of the Program is to: (1) Reduce children's exposure to lead in drinking water; (2) Help states target funding toward schools and child care programs unable to pay for testing; (3) Utilize the 3Ts model or model no less stringent to establish best practices for a lead in drinking water prevention program; (4) Foster sustainable partnerships at the state and local level to allow for more efficient use of existing resources and exchange of information among experts in various educational and health sectors; and (5) Enhance community, parent, and teacher cooperation and trust.

VI. ANTICIPATED OUTCOMES/OUTPUTS:

Outputs

- 1) Use the EPA's 3Ts for Reducing Lead in Drinking Water guidance to continue the state program;
- 2) Enhance the state lead testing in drinking water in child care facilities/schools management strategy that was developed to support a robust training, monitoring, and maintenance plan that protects children from lead exposure now and in the future;
- 3) Continue to expand and enhance the Ohio's Lead Testing in Child Cares and Schools Program outreach campaign and educational materials.
- 4) Continue to prioritize testing in vulnerable communities and populations: child care facilities and school buildings in undeserved and/or low-income communities; child care facilities that primarily care for children 6 years and under; and older facilities that are more likely to contain lead plumbing;
- 5) Expand sampling of participating child care facilities/schools for lead at water fixtures to at lead two other counties in the state;
- 6) Providing results of any voluntary testing for lead contamination in child care facility and school building drinking water carried out using grant funds and notifying parents, teachers, and organizations of the availability of the results;
- 7) Continue collaboration with ODH's recommendations for blood lead testing and subsequent referral for services of any children with an elevated blood lead level;
- 8) Providing information and assistance with available short- and long-term remediation options including but not limited to, installation of filters, replacement of fixtures, and or public/private lead service lines where sample results exceed the action threshold;
- 9) Identify ways Ohio can sustain a regular lead testing program for child care facilities;
- 10) Continue to implement routine practices such as those outlined in the 3Ts guidance.

Outputs also include the establishment of a memorandum of agreement (MOA) with the ODH, ODJFS, OEPA, the 3rd party contractor(s), and the public water systems to implement this program.

Outcomes

- 1) Child care facilities, unable to pay for testing, implementing a testing program and where action thresholds are exceeded, mitigating lead exposure through potential regulatory action, and/or funding sources for remediation where available;
- 2) Reduction of children and staff in child care facilities and schools exposure to lead in drinking water;

- 3) Potential identification of children with EBLLs and appropriate referrals for services.
- 4) Improvement of staff and administration and community knowledge on lead in drinking water and other environmental hazards;
- 5) Long term sustainability of Ohio's Lead Testing in Child Cares and Schools Program and routine practices such as those outlined in the 3Ts guidance;
- 6) Fostering sustainable partnerships at the state and local level to allow for a more efficient use of resources and the exchange of information among experts in various areas of child care, utility, and health sectors;
- 7) The enhancement of community, parent, and teacher trust.

VII. BUDGET NARRATIVE:

APPENDIX A: PARTNERS UNDER THIS PROGRAM

Below are the partners that will be involved in this program.

Ohio, Environmental Protection Agency

50 W Town St.

Columbus, OH, 43215

[HYPERLINK "mailto:Emilie.eskridge@epa.ohio.gov"]

Ohio, Department of Job and Family Services

30 E Broad St.

Columbus, OH, 43215

[HYPERLINK "mailto:kristen.burgess@jfs.ohio.gov"]

Cincinnati Water Works

https:// HYPERLINK "http://www.cnfwu.org/" \h]gov/water/

Cleveland Water

http://[HYPERLINK "http://www.parentsforhealthynfschools.com/" \h]

Additional Partners will include:

- County Health Departments
- County Job and Family Services
- Third party consulting company (sampling)
- Third party marketing firm
- Third party content development firm